

Exhibit B

Reply in Support of
Defendant Yassin Abdullah Kadi's
Memorandum in Support of Motion to Dismiss

03 MDL 1570 (RCC)

26 September 2002

Investigators find Al-Kadi dealings in Albania were clean

By Mohammed Alkhereiji
Arab News Staff

JEDDAH — Investigators in Albania have absolved Saudi businessman Yassin Al-Kadi of any financial wrongdoing after his bank accounts and other assets in the country were frozen because of his suspected links with Al-Qaeda organization.

The governor of the Albanian Central Bank, Shkelqim Cani, has reported to the Albanian Parliament the findings of a committee set up to investigate Al-Kadi's financial dealings in the country.

After a thorough investigation of Al-Kadi's accounts with three banks and his companies operating there, it was found that all his transactions were legitimate and above board. It was found that he did not violate any laws.

Al-Kadi told Arab News yesterday that he welcomed the committee's findings.

"I was sure they would bring this verdict, but it was just a matter of making it official," he added.

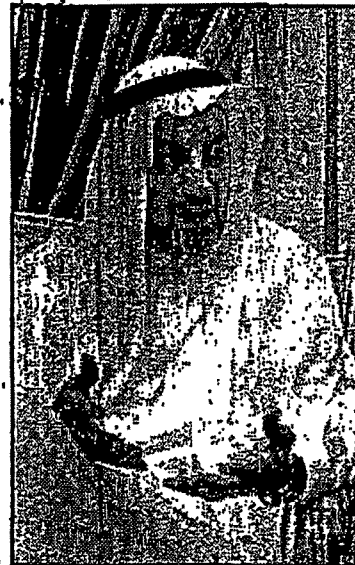
Al-Kadi's name was on a list of 39 individuals and organizations made by the FBI in October last year for freezing of assets. Al-Kadi said he believed his name was included on the FBI list because of his position as a founding member of the Saudi Arabia-based Muwafaq Foundation, which was closed down six years ago.

Last November, Al-Kadi was given permission to challenge another move against his assets, this time by the Treasury in London, because of his alleged links to Osama Bin Laden's Al-Qaeda. The order against him was branded as "draconian" by the judge, Justice Scott Baker, who said that there was an arguable case to challenge it.

Regarding this court case, Al-Kadi said: "I can't comment on that right now. All I can say is that I look forward to having my day in court there."

The freezing order on Al-Kadi's assets was originally revealed in a news release containing a list of individuals and organizations with alleged terror links published by the US and British governments last October.

Officials at the Albanian General Prosecutor's Office initially reported millions of dollars in Al-Kadi's accounts in 13 Albanian banks were frozen as part of the investigation. Al-Kadi headed the



Yassin Al-Kadi

Muwafaq Foundation, which American investigators allege is linked to Al-Qaeda, a charge denied by Al-Kadi's lawyers.

Al-Kadi previously said he had instructed his lawyers to initiate legal action against the decision and was now awaiting official clarifications from Albanian authorities as to what happened and on what basis such an action was taken.

More than 25 Saudi businessmen and firms have invested in a twin tower project, costing less than \$4 million, in the center of Albanian capital Tirana. Several Albanian companies hold the rest of the shares.

Al-Kadi is a partner in the construction company set up by a group of Saudi, Arab and Albanian businessmen to build various projects in the Southern European country. The company, capitalized at \$20 million, is 28 percent Saudi-owned and was set up following a business forum organized in Tirana by the Jeddah-based Islamic Development Bank to encourage Muslim businessmen to help in the development of the former communist state.

The bank held similar forums in several ex-Soviet republics of Central Asia with a large Muslim population.